

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS
ANTITRUST LITIGATION

:
:
Master File No. 12-md-02311
:
Honorable Marianne O. Battani
:

IN RE: ALL AUTO PARTS CASES

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**PARTIES' JOINT MOTION FOR LEAVE TO EXCEED PAGE LIMIT FOR
PARTIES' JOINT REPLY TO CERTAIN NON-PARTIES' OPPOSITIONS TO
THE PARTIES RENEWED MOTION TO COMPEL DISCOVERY**

Pursuant to Rule 7.1(d)(3)(A) of the Local Rules of Civil Procedure, the Parties¹ respectfully request that the Court grant them leave to file The Parties' Joint Reply to Certain Non-Parties' Oppositions to the Parties' Renewed Motion to Compel Discovery in excess of seven (7) pages, with a total of 43 pages (excluding signatures).

The Parties have attempted to limit the length of their brief without sacrificing clarity and/or their ability to address the factual and legal issues supporting their Reply. However, due to the number of factual and legal issues needing to be addressed, and the fact that this is a combined effort by the Parties to jointly respond to six individual OEM oppositions, the Parties have been unable to reduce the number of pages to seven (7).

WHEREFORE, the Parties respectfully request that the Court grant their Motion for Leave to Exceed Page Limits.

¹ The "Parties" joining in this motion include: End-Payor Plaintiff, Truck and Equipment Dealer Plaintiffs, the State of Florida, the State of Indiana, and certain Defendants in *Automotive Parts Antitrust Litigation*, No. 2:12-md-02311-MOB-MKM (E.D. Mich.). Not all Defendants join this motion with respect to all OEMs. See ECF No. 1185 at Attachment A.

Date: December 2, 2016

Respectfully submitted,

/s/ E. Powell Miller

E. Powell Miller

Devon P. Allard

THE MILLER LAW FIRM, P.C.

The Miller Law Firm, P.C.

950 W. University Dr., Ste. 300

Rochester, Michigan 48307

epm@millerlawpc.com

dpa@millerlawpc.com

Interim Liaison Counsel for the Proposed End-Payor Plaintiff Classes

Steven N. Williams

Elizabeth Tran

Demetrius X. Lambrinos

COTCHETT, PITRE & McCARTHY, LLP

San Francisco Airport Office Center

840 Malcolm Road, Suite 200

Burlingame, CA 94010

Telephone: (650) 697-6000

Facsimile: (650) 697-0577

swilliams@cpmlegal.com

etran@cpmlegal.com

dlambrinos@cpmlegal.com

Hollis Salzman

Bernard Persky

William V. Reiss

ROBINS KAPLAN LLP

601 Lexington Avenue, Suite 3400

New York, NY 10022

Telephone: (212) 980-7400

Facsimile: (212) 980-7499

HSalzman@RobinsKaplan.com

BPersky@RobinsKaplan.com

WReiss@RobinsKaplan.com

Marc M. Seltzer

Steven G. Sklaver

SUSMAN GODFREY L.L.P.

1901 Avenue of the Stars, Suite 950

Los Angeles, CA 90067-6029

Telephone: (310) 789-3100

Facsimile: (310) 789-3150

mseltzer@susmangodfrey.com

ssklaver@susmangodfrey.com

Terrell W. Oxford
Chanler Langham
Omar Ochoa
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, TX 77002
Telephone: (713) 651-9366
Facsimile: (713) 654-6666
toxford@susmangodfrey.com
clangham@susmangodfrey.com
oochoa@susmangodfrey.com

*Interim Co-Lead Class Counsel for the
Proposed End-Payor Plaintiff Classes*

/s/ J. Manly Parks

Wayne A. Mack
J. Manly Parks
Andrew R. Sperl
DUANE MORRIS LLP
30 S. 17th Street
Philadelphia, PA 19103
Phone: (215) 979-1000
Fax: (215) 979-1020

*Counsel for Truck and Equipment
Dealer Plaintiffs*

WEIL, GOTSHAL & MANGES LLP

/s/ Adam C. Hemlock (w/consent)

Adam C. Hemlock
Steven A. Reiss
Lara E. Veblen Trager
Kajetan Rozga
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153-0119
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
steven.reiss@weil.com
adam.hemlock@weil.com
lara.trager@weil.com
kajetan.rozga@weil.com

/s/ Frederick R. Juckniess (w/consent)

Frederick R. Juckniess
SCHIFF HARDIN LLP

350 South Main Street, Suite 210
Ann Arbor, MI 48104
(734) 222-1504
fjuckniess@schiffhardin.com

*Attorneys for Defendants Bridgestone
Corporation and Bridgestone APM Company*

WEIL, GOTSHAL & MANGES LLP

/s/ Steve A. Reiss (w/consent)

Steven A. Reiss
Adam C. Hemlock
Lara E. Veblen Trager

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue
New York, New York 10153-0119
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
steven.reiss@weil.com
adam.hemlock@weil.com
lara.trager@weil.com
Fred K. Herrmann
Joanne G. Swanson
Matthew L. Powell

KERR, RUSSELL AND WEBER PLC

500 Woodward Avenue
Suite 2500
Detroit, MI 48226
Tel. (313) 961-0200
Fax (313) 961-0388
fherrmann@kerr-russell.com
jswanson@kerr-russell.com
mpowell@kerr-russell.com

*Counsel for Defendants Calsonic Kansei
Corporation and Calsonic Kansei North
America, Inc.*

BUTZEL LONG

/s/ Sheldon H. Klein (w/consent)

Sheldon H. Klein (P41062)
David F. DuMouchel (P25658)

BUTZEL LONG

150 West Jefferson, Suite 100
Detroit, MI 48226
Tel.: (313) 225-7000
Fax: (313) 225-7080

sklein@butzel.com
dumouchd@butzel.com

W. Todd Miller
BAKER & MILLER PLLC
2401 Pennsylvania Ave., NW, Suite 300
Washington, DC 20037
Tel.: (202) 663-7820
Fax: (202) 663-7849
TMiller@bakerandmiller.com

*Attorneys for Defendants TRAM, Inc. and
Tokai Rika Co., Ltd.*

COVINGTON & BURLING LLP

/s/ Anita F. Stork (w/consent)

Anita F. Stork
Gretchen Hoff Varner
Cortlin H. Lannin
COVINGTON & BURLING LLP
One Front Street, 35th Floor
San Francisco, CA 94111
Telephone: (415) 591-6000
Fax: (415) 955-6550
astork@cov.com
ghoffvarner@cov.com
clannin@cov.com

Michael J. Fanelli
Ashley E. Bass
COVINGTON & BURLING LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: (202) 662-6000
Fax: (202) 662-5383
mfanelli@cov.com
abass@cov.com

*Attorneys for Defendants Alps Electric Co.,
Ltd.; Alps Electric (North America), Inc.;
and Alps Automotive, Inc.*

**BROOKS WILKINS SHARKEY &
TURCO PLLC**

/s/Maureen T. Taylor (w/consent)

Herbert C. Donovan (P51939)
Maureen T. Taylor (P63547)

**BROOKS WILKINS SHARKEY &
TURCO PLLC**

401 Old South Woodward, Suite 400
Birmingham, MI 48009
Telephone: (248) 971-1721
Fax: (248) 971-1801
taylor@bwst-law.com
donovan@bwst-law.com

*Attorneys for Defendants Alps Electric
Co., Ltd.; Alps Electric (North America),
Inc.; and Alps Automotive, Inc.*

**SIMPSON THACHER & BARTLETT
LLP**

/s/ George S. Wang (w/consent)

George S. Wang
Shannon K. McGovern

**SIMPSON THACHER & BARTLETT
LLP**

425 Lexington Avenue
New York, N.Y. 10017
Tel: (212) 455-2000
Fax: (212) 455-2502
gwang@stblaw.com
smcgovern@stblaw.com

Abram J. Ellis

**SIMPSON THACHER & BARTLETT
LLP**

900 G Street, N.W.
Washington, D.C. 20001
Tel.: (202) 636-5500
Fax: (202) 636-5502
aellis@stblaw.com

*Attorneys for Defendants Diamond
Electric Mfg. Co., Ltd. and Diamond
Electric Mfg. Corp.*

**SIMPSON THACHER & BARTLETT
LLP**

/s/ George S. Wang (w/consent)

George S. Wang
Shannon K. McGovern

**SIMPSON THACHER & BARTLETT
LLP**

425 Lexington Avenue

New York, N.Y. 10017
Tel: (212) 455-2000
Fax: (212) 455-2502
gwang@stblaw.com
smcgovern@stblaw.com

Abram J. Ellis
SIMPSON THACHER & BARTLETT LLP
900 G Street, N.W.
Washington, D.C. 20001
Tel.: (202) 636-5500
Fax: (202) 636-5502
aellis@stblaw.com

Attorneys for Defendants Stanley Electric Co., Ltd., Stanley Electric U.S. Co., Inc., and II Stanley Co., Inc.

**PILLSBURY WINTHROP SHAW
PITTMAN LLP**

/s/ William M. Sullivan Jr. (w/consent)
William M. Sullivan Jr.
Michael L. Sibarium
Jeetander T. Dulani
**PILLSBURY WINTHROP SHAW PITTMAN
LLP**
1200 Seventeenth Street, N.W.
Washington, D.C. 20036-3006
Telephone: (202) 663-8000
Facsimile: (202) 663-8007
wsullivan@pillsburylaw.com
michael.sibarium@pillsburylaw.com
jeetander.dulani@pillsburylaw.com

*Counsel for Mikuni Corporation and
Mikuni America Corporation*

FARMER BROWNSTEIN JAEGER LLP

/s/ William S. Farmer (w/consent)
William S. Farmer
David C. Brownstein
FARMER BROWNSTEIN JAEGER LLP
235 Montgomery Street, Suite 835
San Francisco, CA 94102
Tel.: (415) 795-2050
Fax: (415) 520-5678
wfarmer@fbj-law.com
dbrownstein@fbj-law.com

*Counsel for Defendants Mitsuba
Corporation and American Mitsuba
Corporation*

SEABOLT LAW FIRM

/s/ Scott T. Seabolt (w/consent)

Scott T. Seabolt

SEABOLT LAW FIRM

17199 N. Laurel Park Dr., Ste. 215

Livonia, Michigan 48152

248-717-1302

sseabolt@seaboltpc.com

*Counsel for Defendants Mitsubishi
Heavy Industries America, Inc. and
Mitsubishi Heavy Industries ClimateControl,
Inc.*

LANE POWELL PC

/s/ Kenneth R. Davis (w/consent)

Kenneth R. Davis II

Craig D. Bachman

Darin M. Sands

Masayuki Yamaguchi

LANE POWELL PC

ODS Tower

601 SW Second Ave., Suite 2100

Portland, OR 97204-3158

503-778-2100

503-778-2200 (facsimile)

davisk@lanepowell.com

bachmanc@lanepowell.com

sandsd@lanepowell.com

LANE POWELL PC

/s/ Larry S. Gangnes (w/consent)

Larry S. Gangnes

Connor B. Shively

LANE POWELL PC

1420 Fifth Avenue, Suite 4100

Seattle, WA 98101-2338

206-223-7000

206-223-7107 (facsimile)

gangnesl@lanepowell.com

shivelyc@lanepowell.com

*Counsel for Nachi America Inc.
and Nachi-Fujikoshi Corporation*

WINSTON & STRAWN LLP

/s/ Jeffrey L. Kessler (w/consent) Jeffrey L.
Kessler

Jeffrey L. Kessler

A. Paul Victor

Molly M. Donovan

Jeffrey J. Amato

WINSTON & STRAWN LLP

200 Park Avenue

New York, NY 10166

Telephone: (212) 294-6700

Facsimile: (212) 294-4700

jkessler@winston.com

pvictor@winston.com

mmdonovan@winston.com

jamato@winston.com

KERR, RUSSELL AND WEBER, PLC

Fred K. Herrmann

500 Woodward Avenue, Suite 2500

Detroit, MI 48226

Tel. (313) 961-0200

fherrmann@kerr-russell.com

*Counsel for NTN Corporation and
NTN USA Corporation*

ALLEN & OVERY LLP

/s/ John Roberti (w/consent)

John Roberti

Matthew Boucher

ALLEN & OVERY LLP

1101 New York Avenue NW

Washington, D.C. 20005

202-683-3800

john.roberti@allenoverly.com

matthew.boucher@allenoverly.com

Michael S. Feldberg

ALLEN & OVERY LLP

1221 Avenue of the Americas

New York, NY 10020

212-610-6360

michael.feldberg@allenoverly.com

William R. Jansen (P36688)

Michael G. Brady (P57331)

WARNER NORCROSS & JUDD LLP

2000 Town Center, Suite 2700

Southfield, MI 48075-1318

248-784-5000

wjansen@wnj.com

mbrady@wnj.com

*Counsel for Defendants Robert Bosch
LLC and Robert Bosch GmbH*

**MILLER, CANFIELD, PADDOCK &
STONE P.L.C.**

/s/ Larry J. Saylor (w/consent)

Larry J. Saylor

**MILLER, CANFIELD, PADDOCK &
STONE P.L.C.**

150 W. Jefferson Avenue, Suite 2500

Detroit, MI 48226

Telephone: (313) 496-7986

Facsimile: (313) 496-8454

Saylor@MillerCanfield.com

*Counsel for Defendants Sumitomo Riko
Company Limited and DTR Industries, Inc.*

WILLIAMS & CONNOLLY LLP

/s/ David M. Zinn (w/consent)

David M. Zinn

John E. Schmidtlein

Samuel Bryant Davidoff

WILLIAMS & CONNOLLY LLP

725 Twelfth Street, N.W.

Washington, DC 20005

202-434-5000

Fax: 202-434-5029

dzinn@wc.com

jschmidtlein@wc.com

sdavidoff@wc.com

Counsel for Takata Corporation and

TK Holdings, Inc.

HERTZ SCHRAM PC

/s/ Bradley J. Schram (w/consent)

HERTZ SCHRAM PC

1760 S. Telegraph Rd., Suite 300
Bloomfield Hills, MI 48302
Tel.: (248) 335-5000
Fax: (248) 335-3346
bschram@hertzschrampc.com

*Counsel for Toyo Tire & Rubber Co., Ltd.,
Toyo Automotive Parts (USA), Inc., Toyo
Tire North America Manufacturing Inc.,
and Toyo Tire North America OE Sales LLC*

BAKER BOTTS LLP

/s/ Randall J. Turk (w/consent)

Randall J. Turk
John Taladay
Mark Miller
Heather Souder Choi
Sterling A. Marchand
BAKER BOTTS LLP
1299 Pennsylvania Ave., NW
Washington, D.C. 20004-2400
Phone: 202.639.7700
Fax: 202.639.7890
randy.turk@bakerbotts.com
john.taladay@bakerbotts.com
mark.miller@bakerbotts.com
heather.choi@bakerbotts.com
sterling.marchand@bakerbotts.com

*Counsel for Toyoda Gosei Co., Ltd., TG
Missouri Corporation, and Toyoda Gosei
North America Corporation*

WHITE & CASE LLP

/s/ Christopher M. Curran (w/consent)

Christopher M. Curran
WHITE & CASE LLP
1155 Avenue of the Americas
New York, New York 10036
Telephone: (212) 819-8200
Facsimile: (212) 354-8113

*Counsel for Defendant Maruyasu
Industries Co., Ltd.*

**KERR, RUSSELL AND WEBER,
PLC**

/s/ Joanne Geha Swanson (w/consent)

Joanne Geha Swanson (P33594)

Fred K. Herrmann (P49519)

500 Woodward Avenue, Suite 2500

Detroit, MI 48226

Telephone: (313) 961-0200

Facsimile: (313) 961-0388

fherrmann@kerr-russell.com

jswanson@kerr-russell.com

*Counsel for Defendants Fujikura Ltd. and
Fujikura Automotive America LLC*

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2016 I caused the foregoing PARTIES' JOINT MOTION FOR LEAVE TO EXCEED PAGE LIMITS to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ E. Powell Miller

E. Powell Miller